## **REMARKS**

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1 and 15 through 20 are pending, with Claims 1, 19, and 20 being independent.

Claims 1 and 15 through 20 yet again were variously rejected under 35 U.S.C. § 103 over newly-cited Japanese Laid-Open Patent Appln. No. 2001-119644 ("JP '644"), U.S. Patent No. 6,449,018 B1 (Yokoyama), and commonly-assigned U.S. Patent No. 6,492,982 B1 (Matsuzaki, et al.), all previously-cited. All rejections are respectfully traversed, and are submitted to have been obviated by the filing herewith of sworn translation of Japanese Patent Application No. 2001-10665 filed January 18, 2001, from which application the subject application claims priority under 35 U.S.C. § 119, and which application pre-dates the April 27, 2001 publication date of JP '644, thereby precluding application of that document under 35 U.S.C. § 102(a). MPEP 201.15. Also, reliance upon Applicant's own specification, at the bottom of page 4 of the Official Action, is respectfully submitted not to be proper, in Applicant's view; nor is Applicant required to present evidence of unexpected results, as stated at page 5 of the Official Action. And Applicant respectfully submits that the Official Action has not shown any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the claimed invention.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims

discussed above. Therefore, separate and individual consideration of each dependent claim

is respectfully requested.

Applicant submits that this application is in condition for allowance, and a

Notice of Allowance is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C.

office by telephone at (202) 530-1010 All correspondence should continue to be directed

to our address given below.

Respectfully submitted,

/Daniel S. Glueck/

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